

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KOREA ADVANCED INSTITUTE OF
SCIENCE AND TECHNOLOGY

Plaintiff,

v.

CASE NO.: 2022-CV-00317

KIP CO., LTD. f/k/a KAIST IP Co., Ltd.;
P&IB CO., LTD.;
IN GYOO KANG;
KIPB LLC f/k/a KAIST IP US LLC;
PAULINA FUNDINGCO, LLC; and
U.S. BANK NATIONAL ASSOCIATION

Defendants.

**U.S. BANK NATIONAL ASSOCIATION'S NOTICE OF MOTION AND
MOTION TO DISMISS UNDER FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)
OR, IN THE ALTERNATIVE, TO DROP U.S. BANK AS A PARTY TO THIS ACTION UNDER
FEDERAL RULE OF CIVIL PROCEDURE 21**

NOTICE

TO: All Counsel of Record (*via* e-filing)

PLEASE TAKE NOTICE that Defendant U.S. Bank National Association ("U.S. Bank"), by and through its undersigned attorneys, Michael Best & Friedrich LLP, will move the Court for an order, pursuant to Fed. R. Civ. P. 12(b)(6) and/or Fed. R. Civ. P. 21, dismissing Plaintiff Korea Advanced Institute of Science and Technology's complaint as to U.S. Bank. The Motion will be heard at a date and time to be determined by the Court. The Motion follows.

MOTION

Defendant U.S. Bank National Association ("U.S. Bank"), by and through its undersigned attorneys, Michael Best & Friedrich LLP, will move the Court for an order,

pursuant to Fed. R. Civ. P. 12(b)(6) and/or Fed. R. Civ. P. 21, dismissing Plaintiff Korea Advanced Institute of Science and Technology's complaint as to U.S. Bank.

In support of its motion, U.S. Bank submits the accompanying Brief.

Dated: June 3, 2022

Respectfully Submitted,

/s/ Christopher J. Schreiber

Christopher J. Schreiber, SBN 1039091

Alexander M. DeGuire, SBN 1097948

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*Counsel for Defendant U.S. Bank National
Association*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June, 2022, a copy of the foregoing document was served *via* electronic service through the Court's electronic filing system on all counsel of record.

/s/ Christopher J. Schreiber
Christopher J. Schreiber